

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Robert Manchel, Esquire
1 Eves Drive, Suite 111
Marlton, NJ 08053-3125
Attorney for Debtor
RM-1141

In Re:

Porsche S. Merricks

Case No. 17-24265CMG

Judge: Honorable Christine M. Gravelle
Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following
(choose one):

1. ____ Motion for Relief from the Automatic Stay filed by ____, creditor.
A hearing has been scheduled for ____, at ____ a.m.

OR

____ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has
been scheduled for ____ at ____ a.m.

OR

X Certification of Default filed by Toyota Motor Credit, creditor. I am
requesting that a hearing be scheduled on this matter.

OR

____ Certification of Default filed by Standing Chapter 13 Trustee.
I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

X Other: I will make a regular payment on June 3, 2018. I would like to cure the balance of the arrears over six (6) months and resume regular payments as of June 2018. I respectfully request that the motion be denied and permit me to resolve the matter as requested and continue with my bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 5/22/2018

/s/ Porsche S. Merricks
Porsche S. Merricks, Debtor